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ABSTRACT

The purpose of this paper is to develop a generic conceptual framework for understanding the intergovernmental implementation of state administered federal categorical aid programs in education. In addition to building on the base laid by previous research, the development of this framework also relies on empirical research conducted on the administration of Elementary and Secondary Education Act Title I programs in 32 school districts in eight states. The intergovernmental implementation framework has three components. The first is the conceptualization of a dynamic intergovernmental implementation system, shaped by the interactions of outside agency requirements and administrative actions in the local context. The second specifies the three critical variables in the intergovernmental implementation process: knowledge, commitment, and capacity. The final component defines and operationalizes the concept of "state role orientation" as a powerful analytic tool for understanding federal/state/local relationships in implementing state administered federal categorical programs. After the components of the framework are fully described, its utility and implications for federal policy-makers, as well as those studying the policy implementation process, are discussed. (Author/IRT)

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Toward a Conceptual Framework for Understanding the Intergovernmental Implementation of Federal Aid Programs in Education

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Introduction

It was once quite fashionable to begin discussions of public policy implementation with two categorical assertions: 1) that study in this area was critically important in order to understand why federal policies so often fail to fulfill their intended outcomes and, 2) that given this importance it is surprising that the public policy implementation process has not received more scholarly scrutiny (see, for example, Pressman and Wildavsky 1973, Ingram, 1977, Kritek, 1976, and Van Meter and Van Horn, 1975). While the first assertion continues to be as appropriate today as ever before, in recent years the noteworthy absence of implementation studies in the public policy literature has been substantially alleviated. In fact, a considerable body of empirically based findings on the implementation phenomena now exists.*

Probably nowhere has the recent scholarly fascination with federal policy implementation been as acute as in the area of elementary and secondary education. Beginning with Bailey and Mosher's early account of the implementation of ESEA Title I (Bailey and Mosher, 1968) and continuing through research (much of it federally sponsored) on the implementation of such diverse federal programs

*Major works on the subject of implementation in the past decade include Pressman and Wildavsky's (1973) study of the implementation of Oakland's community development program, Derthick's (1970 and 1972) examinations of the implementation of federal public assistance laws in Massachusetts and the Johnson administration's "New Town" initiative and Berke and Kirst's (1972) analysis of the state implementation of federal aid to education programs. In addition, the Departments of Labor, HEW and HUD have in recent years commissioned many studies to investigate the process of implementing their major legislative initiatives.

as ESEA Title I, the Vocational Education Act and the Education for all Handicapped Children Act, an abiding and unsaturated interest has been shown by the research community over the issue of effectively implementing federal educational policy thrusts. Among the most noteworthy contributions to this area have been the works of Joel Berke and Michael Kirst (1972), Jerome Murphy (1971 and 1974), Milbrey McLaughlin (1976), and Lorraine McDonnell and John Pincus (1977).

Whether the substantive research focus has been ESEA Title I, public assistance legislation or even United States Supreme Court decisions (see, for example, Krislov 1965), the underlying question addressed by studies of the intergovernmental policy implementation process have been similar: How and why does local administrative policy and practice conform (or fail to conform) with what is desired at the Federal level? These studies have compared the intent of federal initiatives and accompanying federal expectations for how they would be translated into local policy and practice, with what actually takes place in the "real world", and have attempted to explain areas of consistency and discrepancy. For example, McLaughlin in her discussion of ESEA Title I implementation attempted to explain the discrepancy between a legislative expectation that the program would reform the educational services available to the nation's poor children" (1976, p. 397) and the "real world" situation in which Title I resources were allocated for programs which were , "(1) more of the same and (2) ancillary to the central educational services of the school" (1976, p. 412). Similarly, Derthick in her study of the implementation of public assistance policy in Massachusetts examined how the federal government pursued such goals

as the efficient state administration of the public assistance function, non-discriminatory state service delivery arrangements, and the professionalization of state social service personnel in that state and what factors explained the nature and degree of federal influence on local activity in these areas (Derthick, Chapter 1).

What has intrigued us in reading the recent literature on public policy implementation is whether a generic conceptual framework on this question could be developed from prior research findings. This framework could enable us to better understand why some federal programs are more faithfully implemented locally than others and why within a single federal categorical program certain grantees are more likely to fulfill federal administrative expectations than others.

The purpose of this paper is to develop a generic conceptual framework for understanding the intergovernmental implementation of state administered federal categorical aid programs. As will be demonstrated shortly, critical elements and concepts which bear directly on the creation of this framework have already been developed by such authors as Milstein (1976), McLaughlin (1976), and Van Meter and Van Horn (1975). In addition to building on the base laid by these and other scholars the development of this framework also relies upon empirical research conducted by the authors on the administration of ESEA Title I in eight states and 32 school districts. In that study we explored the intergovernmental behaviors and linkages between federal government, states, school districts and schools through a comparative case study approach, primarily for the purposes of evaluating existing administrative procedures and developing recommendations for their improvement. The framework is thus a product of synthesizing the relevant implementation literature with what was directly observed in studying the implementation of one major federal aid to education program.

In the following section of this paper we introduce the three components of the framework. The first component is our conceptualization of the intergovernmental implementation system, the second component specifies the critical variables in the intergovernmental implementation process, and the final component defines and operationalizes the concept of "state role orientation" as a powerful analytic tool for understanding federal/state/local relationships in implementing state administered federal categorical programs. The concluding section of this paper will describe the utility of this framework for federal policy makers as well as those studying the policy implementation process, and the potential application of this model for improving the federal administration of categorical programs in education.

The Components of the Intergovernmental Implementation Framework

In this section we outline the critical components of our intergovernmental implementation framework. The framework has been developed to facilitate the answering of this basic intergovernmental implementation question:

- Why within a single federal categorical program do some state and local program implementers more fully meet federal administrative expectations than others?

The Intergovernmental Implementation Process

The first step in understanding the implementation of federal categorical aid programs is recognizing the dynamic intergovernmental context in which all implementation activity occurs. In a federal system, responsibility and authority for program implementation is shared by discrete institutions at different government levels rather than being the exclusive purview of a single organization. We thus have in the works of Philip Gregg "...the exercise of concurrent powers among semi-autonomous officials rather than...hierarchical powers conferred by a single all-encompassing government" (Greg, 1974, p. 64).

In implementing state administered federal categorical aid programs federal, state and local officials belonging to different public organizations must interact with each other. The federal government communicates administrative performance expectations to state program implementers through its program requirements and accompanying administrative activities (information dissemination, compliance monitoring, technical assistance, sanctions and incentives, leadership, etc.). States in turn then communicate their administrative performance expectations to local grantees in a similar manner.

One might be inclined to ask what difference it makes whether one organization is implementing a federal policy or more than one level of government is involved as long as one set of formal administrative requirements exists for all program administrators. The answer is that the formal requirements themselves are but one set of factors affecting how a federal program is going to be administered. As Floyd Stoner has pointed out "...administrators do not simply respond to the language of policy directives in a straight forward, stimulus-response manner. The operation is more complex" (Stoner, 1976, p. 26). Ingram likens federal-state administrative relations in grant-in-aid programs to the bargaining that takes place in the marketplace between a rich merchant and a sly bargain-hunting consumer (Ingram, 1977). In a federal system those ultimately responsible for implementing federal program requirements are members of state or local agencies whose values, capabilities and predispositions have been heavily shaped by their local or state context. Such factors as the generic administrative thrusts of the agency's chief officer, the demographic characteristics of the agency's client population and the historic traditions of the agency regarding its appropriate administrative functions and priorities will determine the nature of this context.

In state administered federal categorical aid programs all federal program requirements must in a sense pass through the filters of state and later local

administrative context before being implemented. Milstein (1976) and Berke and Kirst (1972) among others have made this observation before with regard to implementing federal aid to education programs. For any federal aid program it is the interplay of federal requirements and the administrative actions accompanying them with state program context, and then state requirements and their accompanying administrative actions with local program context which will shape ultimate program implementation activity. Figure 1 depicts this general conceptualization of the intergovernmental implementation process.

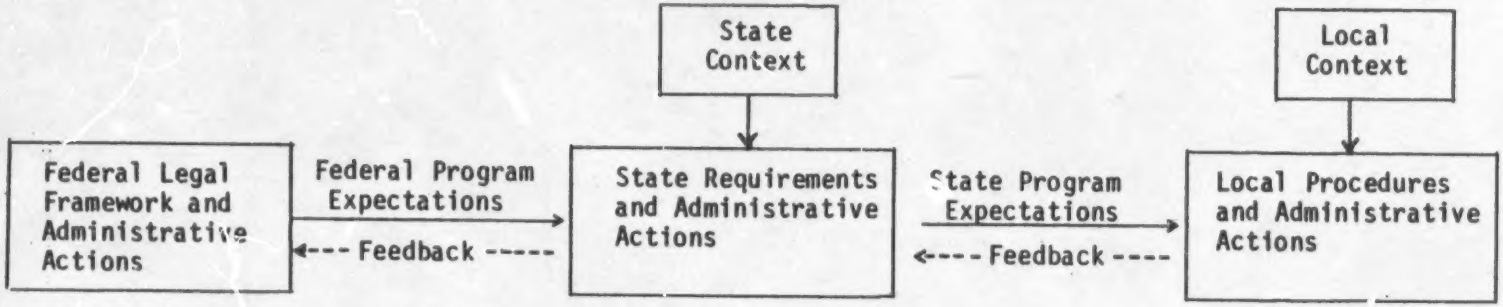
Whether for any federal program requirement ultimate local implementation activity will tend to conform to federal administrative expectations will depend on the degree to which state and/or local organizational contexts serve as a barrier or a facilitator to the meeting of the federal program objectives embodied in that requirement. For certain requirements and for all requirements at certain sites, federal administrative performance expectations may pass through state and local administrative filters relatively unblemished. In fact, we observed situations in ESEA Title I where state and local administrative activity was not only consistent with federal expectations but went beyond them (Goettel, Kaplan and Orland, 1977). However, in other cases the state and local contextual filters may serve to substantially alter the basic nature of one or more federal programs requirements such that major federal administrative expectations are not realized.

Key Intergovernmental Implementation Variables

We have identified three independent variables which are considered crucial determinants of whether for any federal aid program local Implementation will be consistent with federal performance expectations. These variables represent three conditions which we view as necessary for subordinate administrative agencies to meet the expectations of their superordinate units:

Figure 1

The Intergovernmental Implementation Process



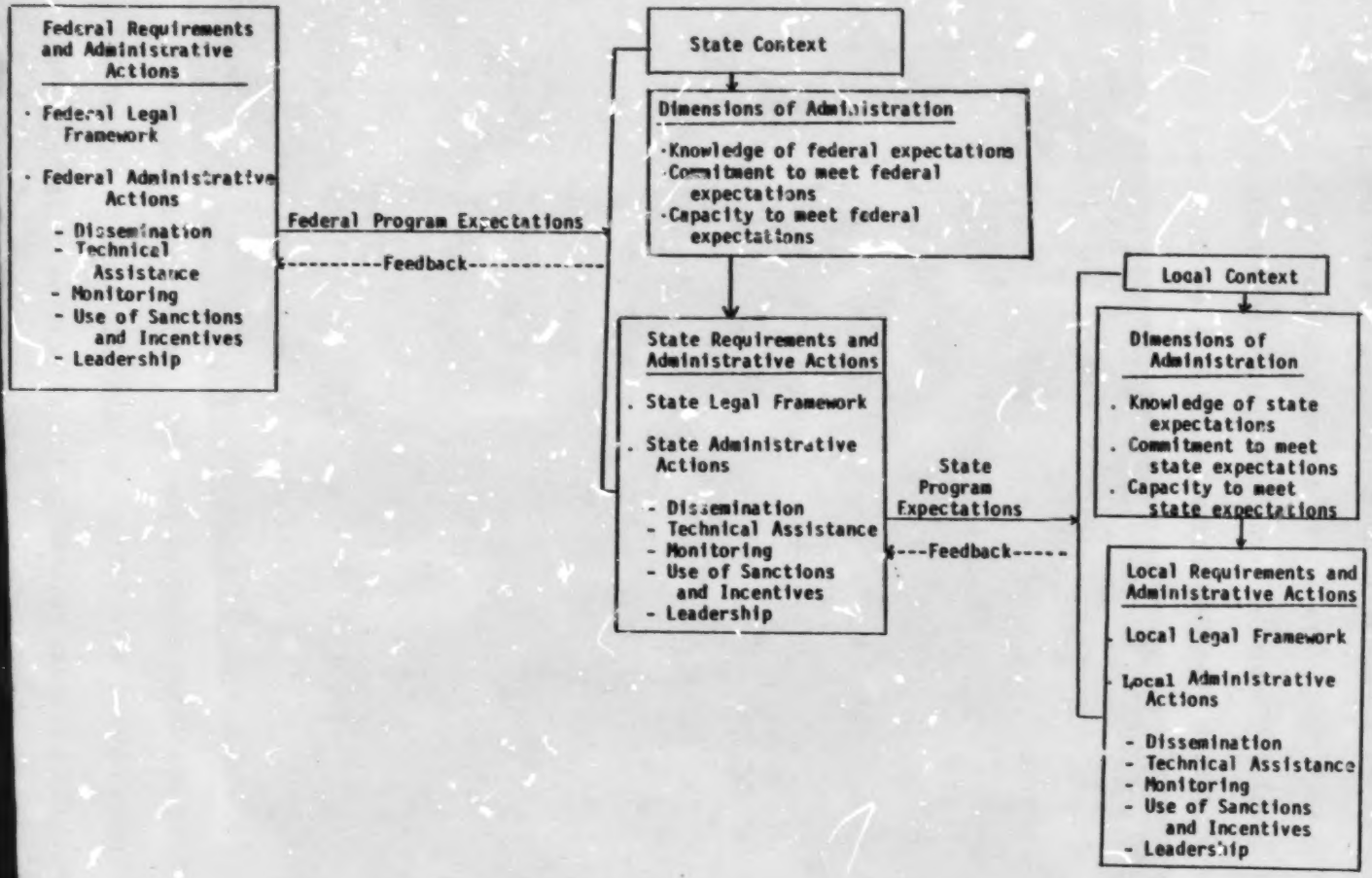
- Knowledge of what the superordinate agency expectations in fact are
- A commitment to meeting these expectations, and
- The administrative capacity to meet these expectations.

Figure 2 adds the three intergovernmental implementation variables of knowledge, commitment and administrative capacity to our framework. As is depicted the three variables represent independent "products" of the interaction of superordinate agency requirements and administrative action with subordinate agency context. Such interaction needs to result in subordinate agencies possessing adequate knowledge of superordinate agency administrative expectations and adequate levels of commitment and administrative capacity to meet these expectations, if the program objectives of the superordinate agency are to have a chance of being realized.

We do not claim to be the first to recognize the importance of these variables in explaining the intergovernmental implementation phenomena. Indeed they are in part adopted from McLaughlin's analysis of the failure of Title I in which she identified the four factors of common goals, knowledge, incentive/disincentives and authority as being necessary to promote local compliance with federal policy directives (McLaughlin, 1976). In addition, others have identified these or similar variables in their analysis of the intergovernmental implementation process including Van Meter and Van Horn (1975), William Kritek (1976), Jerome Murphy (1971), and Lorraine McDonnell and John Pincus (1977). Our contribution lies not in discovery of these factors but rather in the hypothesis that they represent generic constructs which can be utilized to systematically explain implementation behavior in an intergovernmental setting.

Figure 2

Key Implementation Variables and the
Intergovernmental Implementation Process



Knowledge. The organizational change and innovation literature has done a far better job than the political science/compliance literature in recognizing the critical role knowledge plays in explaining discrepancies between federal expectations and local performance. Among the major contributions in this regard in the area of education have been Gross, Giacquinta and Bernstein (1971), Robert Herriott and Neil Gross (1979, Chapter 2), McLaughlin (1976) and Berman and McLaughlin (1977). These studies all report that those responsible for implementing a particular educational idea or program frequently do not understand what their superiors expect them to do.

Knowledge problems can be expected to be more frequent in intergovernmental implementation contexts than when all implementation actors are members of the same organization. In intergovernmental administrative arrangements the superordinate agency may not wish to make its expectations explicit for fear of alienating important grantee constituencies, or because the program's goals are, in fact, multiple and potentially conflicting and a thorough explication of them would only serve to surface these contradictions. Especially in the area of education traditions of localism have often made federal and state administrators reluctant to communicate their performance expectations to categorical program grantees, despite their possessing the necessary statutory authority to do so (see for example, Berke and Kirst, 1972; McLaughlin, 1976; and NIE, 1977).

In our study of ESEA Title I administration we found the federal government frequently unable or unwilling to communicate its performance expectations clearly to state education agencies (Goettel, Kaplan and Orland, 1977). In addition we found federal expectations to be systematically clearer and more demanding in statutory areas related to the allocation of federal Title I

dollars than in those related to mandated local program development processes. Consequently, local school districts tended to be far clearer on what their responsibilities were for insuring that Title I dollars serve the right children than on the proper procedures for planning and designing the nature of the Title I activity for these children (Goettel, Kaplan and Orland, 1977).

Commitment. Assuming that subordinate agencies are aware of the performance expectations of superordinate administrative units they still must be commited to attempting to meet these expectations. Grantees may possess such a commitment for two basic reasons: (1) they share the same basic goals for the program as does the superordinate unit or (2) they respect that agency's legitimacy in determining how the program should be implemented. If federal program goals are not shared by the state implementing agency and there is inadequate respect for the legitimacy of federal authority to shape state administrative activity, then state behavior can be expected to be at considerable variance with federal administrative expectations. Similarly, local implementation will differ from state expectations when the local implementing agency fails to share state program goals and respect the legitimacy of its autority.

By examining for any intergovernmental program whether subordinate agencies; (1) share the same program objectives as the superordinate agency and, (2) respect the legitimacy of superordinate agency authority, we can reach some conclusion regarding whether grant recipients are likely to make the necessary commitments to meet superordinate agency expectations. The nature of state and local context can be expected to play a major role in determining whether goal compatability and adequate respect for superordinate agency authority in fact exists. Also important however, are the nature of the federal and state goals themselves as well as the authority mechanisms employed to assure that these goals are met.

Based on the interactions of state context with federal requirements and administrative actions, a level of state commitment for meeting federal program expectations will emerge. In some cases adequate levels of state commitment may exist because the state shares the same objectives for the program as the federal government.* In other cases a state may disagree strongly with federal program goals but federal authority mechanisms are strong enough to make these disagreements irrelevant to state administrative performance. In still other cases disagreement over federal policy goals may combine with a lack of respect for the legitimacy of superordinate agency authority to produce a low level of state commitment to administering particular federal policy requirements.

Our exploration of SEA behavior in eight states in implementing ESEA Title I found examples of each of the three above-mentioned scenarios. Most of the states visited shared the federal goals for the program and appeared comfortable with the federally prescribed means for achieving them. However, in two of the states visited major disagreements over the wisdom of federal goals coupled with inadequate respect for the legitimacy for federal authority combined to produce lukewarm state commitments to meeting federal administrative expectations. In a third state it was clear that the SEA would have run the Title I program in a very different way than it did were it not for the state's concern over the federal government using its authority to enforce compliance with its requirements. These three patterns were also observed in numerous SEA/LEA Title I relationships (Goettel, Kaplan and Orland, 1977).

*It must be pointed out that our notion of intergovernmental goal compatability encompasses both a sharing of broad policy objectives between levels of government and basic agreement on the strategies necessary to achieve these objectives. As Pressman and Wildavsky point out, disagreements between governmental levels over appropriate administrative behaviors are often over the instrumental strategies that will best achieve shared basic program objectives (Pressman and Wildavsky, 1973, p. 399).

Administrative Capacity. Even in situations where grantees are clear about the expectations of their superordinate agency and possess the necessary desire to meet them, their administrative performance may still be stymied by a lack of adequate administrative capacity. Quite simply grant recipients may lack the expertise to meet performance expectations in difficult areas such as insuring adequate citizen involvement, evaluating program impacts, and developing effective staff capabilities.

To narrow such "capacity gaps" federal and state administrators frequently disseminate capacity-building materials, sponsor technical assistance workshops, establish on-going technical assistance centers and communications networks, act to increase program administrative set-aside funds for grantees and even award grants to administering agencies for the specific purpose of improving their administrative capacities. However, the intergovernmental implementation context plus the absence of established and commonly accepted theories of educational improvement combine to limit the impact of these capacity building initiatives.

Federal and state governments have, at best, limited control over the organization and development of local administrative resources. Capacity can't be built through administrative fiat. Superordinate administrative agencies can only provide some external incentives for administrative capacity-building such as through program requirements in particular areas and offers of assistance to facilitate this development. Even when these occur their success depends on the interactions of these outside requirements and assistance efforts with local contextual factors such as staff capabilities and philosophies of educational improvement.

Of course, the extent to which the issue of inadequate grantee capacity is a barrier to the faithful implementation of any particular federal program initiative is dependent on the nature of superordinate performance expectations for that initiative. In ESEA Title I, we found that the federal and state commitments to insuring that Title I dollars serve the right children, coupled with the relatively low level of technical expertise needed at the local level to achieve compliance with this objective, resulted in most districts visited possessing the requisite administrative capacities to fulfill federal administrative expectations in these areas. However, a general federal reluctance to clarify expectations regarding program development mandates in Title I as well as the difficulties involved in effectively implementing these requirements, resulted in districts frequently lacking the administrative capacities to deal effectively with Title I program development concerns. We found the federal and state government providing little external incentive for local districts to further develop their Title I administrative capabilities in such areas as conducting needs assessments, evaluating their programs, and obtaining adequate parent involvement (Goettel, Kaplan and Orland, 1977).

State Role Orientation as a Central Analytic Tool

In any state administered federal categorical aid program, states represent the critical middle link in translating the administrative actions and requirements at the federal level into state-specific requirements and administrative actions which will shape ultimate local program performance. Despite the previous specification of intergovernmental implementation variables we are still at a loss to systematically explain why administration of a federal aid program might vary so significantly among states, and why even within a single state the implementation of different program requirements should be so uneven.

In a broad sense these disparities can be explained by varying levels of state knowledge, commitment and administrative capacity to meet federal performance expectations. But why do these levels so vary? Why does one state possess a commitment or capacity to meet a federal performance expectation when another does not? Why might an identical federal requirement lead to the federally desired behavior in one state and not in another?

We have defined the concept of "state role orientation" to systematically explain fundamental variations in the nature of state implementation behavior. State role orientation refers quite simply to how the state implementers of federal categorical programs perceive their appropriate place or role within the intergovernmental administrative system. The concept is borrowed from and expands upon the social psychology literature which partly defines an individual's behavior in an organizational setting as being a function of that individual's role disposition. (See for example, Katz and Kahn, 1966, p. 47-49.) Similarly those who have studied the implementation of social programs have frequently noted that individual policy implementers differ in their perceptions of their appropriate administrative roles and responsibilities and that these role dispositions help to shape the nature of subsequent implementation behavior (see for example, Milstein, 1976, and Saario, 1979).

Our concept of state role orientation differs from other discussions of the importance of policy implementer role dispositions in two important ways:

- The classification refers not to autonomous individuals but to an organizational orientation of a state governmental unit charged with the responsibility of administering a federal aid program.
- The three discrete dimensions which together comprise a state's role orientation are identified.

State role orientation is quite simply a short-hand construct for understanding how a categorical program unit within a state agency defines its administrative responsibility. Both the literature and our own empirical experience in observing state administration of ESEA Title I has taught us that differential state role perceptions occur along three fundamental dimensions.

Dimension #1 - State Directiveness. State agencies and the categorical program units within them vary significantly in the degree to which they desire to influence the nature of local administrative routines in a major way. Some states are content to be a mere check-writing conduit for federal funds while others wish to use federal programs to promote their own priorities within local grantee agencies, (McDonnell and Pincus, 1977, and Berke and Kirst, 1972, have made this point with regard to SEAs). In our study of ESEA Title I we noted that four of the state education agencies had a significantly greater desire to assert their prerogatives on local administrative behavior. These "directive SEAs" thus were inclined to enact a number of state policies and procedures which instructed districts to run their Title I programs in a particular way. This differed significantly from the general stance of the four "nondirective states", where local Title I procedures and program characteristics tended to be locally determined for the most part, and hence to a large degree a product of local context (Goettel, Kaplan, and Orland, 1977).

States which see a directive role for themselves, vis-a-vis, their relations with local grantees will tend to be both clearer and more demanding in their program performance expectations. We found, for instance, in Title I that directive states tended to disseminate to their districts more detailed and specified implementation requirements than their nondirective counterparts, communicated with their districts more frequently and were less hesitant about using

authority mechanisms to insure compliance. These kinds of state administrative activities combined to produce a message in local school districts regarding state policy preferences and performance expectations. By contrast districts in nondirective states were often either unclear about state performance expectations or convinced that such expectations were minimal (Goettel, Kaplan and Orland, 1977).

Dimension #2 - Substantive Thrust. Whether a state program unit is inclined to be directive or nondirective in its relatinships with its grantees tells us nothing about the general substance of state influence. Milstein and others have pointed out the distinction in education between an SEA's regulatory responsibilities and its responsibilities to improve the quality of local educational programs (Milstein, 1976, also see Friedman, 1971). We think this distinction is a critical one and noted in our Title I study that certain SEA program units in Title I almost exclusively emphasized their regulatory or bureaucratic responsibilities with regard to Title I administration while others paid more attention to program improvement concerns sometimes even at the expense of engaging in their regulatory responsibilities (Goettel, Kaplan and Orland, 1977). The differences in role orientation had major implications in terms of state administrative activity and impact. States with a bureaucratic orientation spent more of their time and resources on issues of program compliance while those that were more programmatically oriented would frequently go beyond minimal federal compliance requirements by emphasizing their technical assistance responsibilities.

Dimension #3 - State Autonomy. Any state program unit in attempting to implement a federal program must in some way attempt to balance concerns over

the continued receipt of federal funds with that of maintaining necessary control over their own resources and programs. As Milstein has pointed out:

> Most organizations can ill afford to ignore environments whose demands they must satisfy if they expect to continue to receive resources...at the same time, most organizations cannot affort to be so open to environmental influence that they risk loss of control over internal activities (Milstein, 1976, p. 80).

The state autonomy dimension of state role orientation depicts how state program units approach this fundamental tension. Depending on the federal program and state contextual factors some states may have no desire to define their program responsibilities independently of federal administrative expectations. These states view their role as one of implementing a federally defined program. Four of the eight states visited in our Title I study possessed such an orientation and hence organized much of their implementation activities around being responsive to federal concerns.

On the opposite end of the dimensional continua are state program units which tend to independently define for themselves their implementation responsibilities. These autonomous states view their role as one of administering their own program rather than the federal government's. Four of the states we visited in Title I exhibited such autonomy. In two of them the independently derived state program goals and procedures for Title I differed sharply from federal program objectives and performance expectations resulting in major administrative tensions between the federal and state governmental units (Goettel, Kaplan and Orland, 1977).

State Role Orientation and the Implementation Model

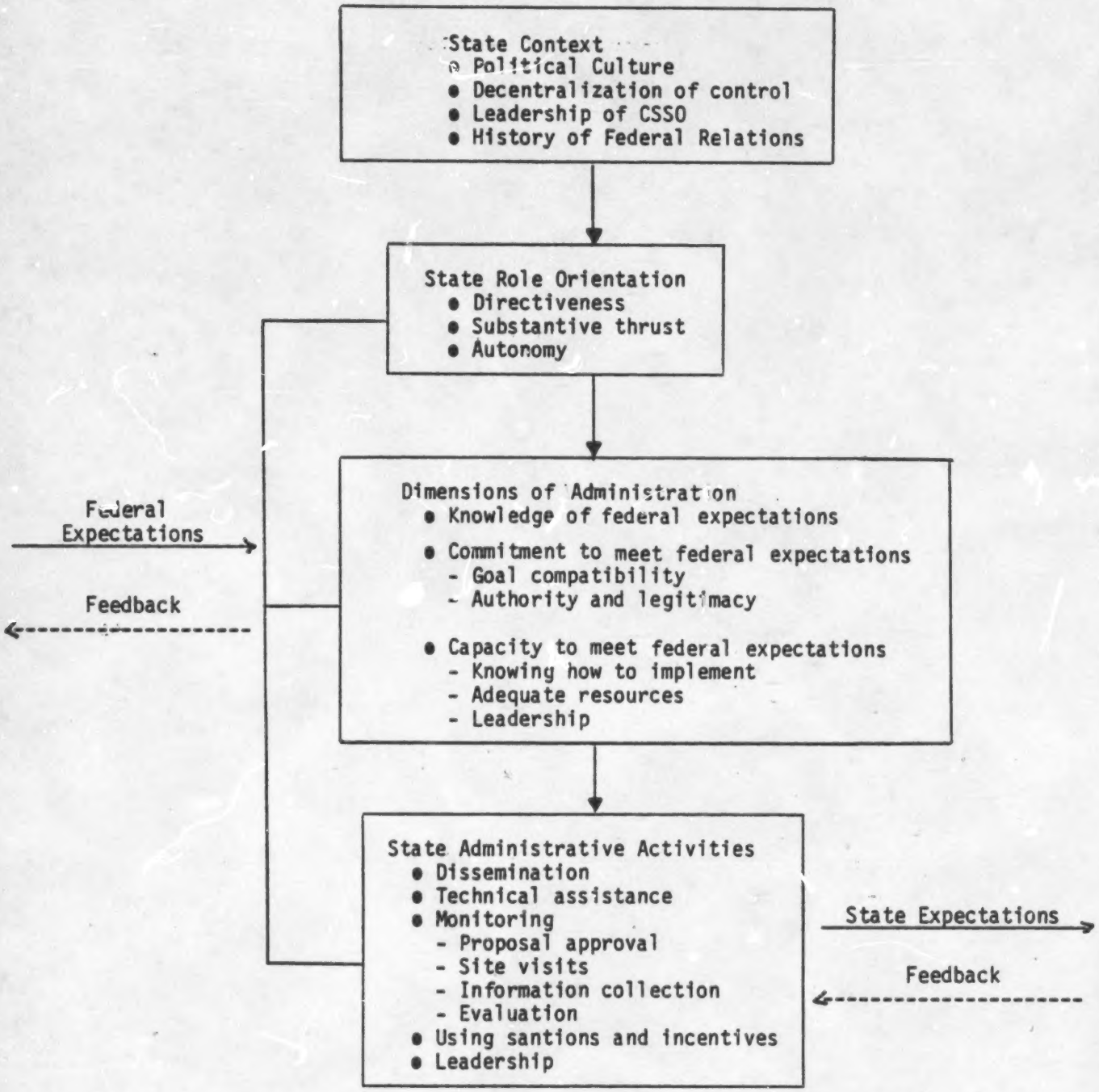
How does the concept of state role orientation fit with the general implementation framework? As Figure 3 indicates, we think that a state's role orientation in adminstering a federal program is, at least in part, driven by state context, and in turn shapes the way the agency views and acts upon federal program expectations.

The state context in which a federal program is administered influences the role orientation of the program in several ways. First, the state political culture in which education is organized, governed and provided varies substantially among states in terms of the balance of control between the SEA and LEAs, the influence of client and professional interest groups and the role of the governor and legislature in the federal aid process (McDonnell and Pincus, 1977 and Wirt, 1978). More generally, states differ in terms of citizens expectations about the role or mission of state government in protecting, controlling or improving their lives (Elazar, 1965). States also differ in the type and quality of leadership expected from the chief state school officer. Finally, the manner in which prior disputes with federal officials over the administration of federal programs were resolved can affect state role orientation.

State context, however, is not always the powerful predictor of SEA administrative performance for federal programs that a cursory reading of political science frameworks might lead one to conclude. Indeed, the connection with political context may be useful only at the margins where context and interventionist behaviors are easily described. More relevant for the study of the implementation of federal programs is the recognition that many such programs reflect the "picket-fence" conception of the intergovernmental partnership in which state-level bureaucrats responsibile, say, for compensatory education, or vocational education or education of the handicapped, identify as much or more

Figure 3

State Role Orientation and Implementation



with their counterparts at the federal and local levels as they do with colleagues in other SEA program areas (see Wright, 1976). Moreover, our studies of ESEA Title I administration indicate that a program's role orientation can change over time as a result of federal actions and the unique influence of leadership changes at the upper levels of an SEA (Goettel, et.al., 1977). Thus, the role orientation of the federal program area staff may be different in important ways from that orientation which generally characterizes the rest of an SEA.

The influence of role orientation on dimensions of state administration and on SEA management activities is a major concern of our framework. Role orientation determines the quantity and the quality of behavioral interactions between SEAs and LEAs that occur as information is disseminated, technical assisance is provided, local projects and programs are monitored and sanctions and incentives are used. These in turn determine the nature of the real messages received by LEAs about federal programs. SEA messages define for LEA officials what the state views as important in local implementation in both absolute and relative terms. For example, while the federal statutes include requirements for evaluating local compensatory education programs for both local program improvement and state/federal reporting purposes, the message given by most states to LEAs is that reporting is important, but evaluation for local use is not. As a result, few LEAs in states where the role orientation precludes intervention in local program decisions, relate their mandated evaluations to such decisions (Goettel et. al., 1977).

A state's perception of its appropriate role in administering a federal categorical program emerges from the interaction of federal program requirements, administrative actions and state context. This role orientation in turn

determines whether the state agency and the LEAs are likely to possess adequate levels of knowledge, commitment and administrative capacity to meet federal program expectations. We would expect to find, for example, a nondirective and autonomous state less likely to be aware of and disseminate information regarding federal program expectations than a directive and federally responsive one. This condition is likely to cause local knowledge difficulties among nondirective/autonomous grantees resulting in local administrative performance often being at considerable variance with federal expectations. Similarly, an autonomous state would be expected to have more commitment problems with regard to trying to meet federal program expectations than a state that is more sensitive about being responsive to federal concerns. In turn, the impact of these commitment difficulties on local administrative activity will be different if the state is directive than if it is nondirective. While in directive states these difficulties between the state and federal government can result in local activity which is consistent with state but not federal program objectives, in a nondirective state local behavior will merely be idiosyncratic.

Policy Implications of the Framework

States clearly play a critical role in the implementation of most federal categorical aid programs in education. They are frequently given the legal responsibility for administering the programs in a manner that is likely to produce the fulfillment of federal policy expectations. Indeed, in education a typical state will have well over half of their SEA's employees supported by federal rather than by state funds. SEAs also are playing an increasingly dominant role in initiating and controlling educational governance and policy decisions. This dominance has increased over the past fifteen years not only because of state responsibility for administering federal programs, but also because of heightened legislative interest in issues such as school finance reform, minimum competency, collective bargaining and teacher certification.

Despite similar responsibilities for administering federal programs and the increased centralization of authority at the state-level, substantial variation exists in state approaches to dealing with educational issues, and in the nature of SEA relationships with local school districts.

We have presented a framework for organizing and analyzing the factors that the literature and our own empirical research suggest affect district-level implementation of state administered federal education programs. Intergovernmental implementation is strongly affected, in our view, by the way that federal expectations and administrative actions interact with state context to influence the role orientation of SEA program staff. Role orientation, then, affects the messages that SEAs communicate to LEAs as staff carry out their dissemination, monitoring, technical assistance, and leadership responsibilities. On balance LEAs respond to SEA messages that indicate what the state views as important in local implementation. Thus, the communication linkages along the knowledge, commitment and capacity dimensions of SEA program administration that derive from role orientation, generate the possibility of substantial variation in local implementation and in the fulfillment of federal expectations.

We have given considerable attention in this framework to the concept of role orientation. Implementation may not occur as expected because implementers do not <u>know</u> or understand federal expectations, or they do not have the <u>commitment</u> towards the federal program as a result of differences regarding program goals and procedures, or differences with respect to the federal government's authority, or because they do not have the <u>capacity</u> to implement the program consistent with federal expectations. Difficulties along any one of these dimensions can affect the way SEAs carry out their administrative responsibilities, and therefore can affect implementation at the LEA level. But, particularly in the case of mature federal programs--those that are beyond the initial confused stages of implementation--we believe that the <u>role</u> that program administrators as individuals and as a group hold for themselves is at the root of

specific implementation difficulties. As we indicate in the previous section of the paper, the role orientation that governs each state's program administration determines those program components considered to be important by the state, as well as the quality and nature of the performance messages received by LEAs. Significantly, local official's responses to these messages are, from a federal perspective, as likely to lead to unnecessary rigidities in local implementation as they are to non-compliant or ineffective program performance.

Our framework suggests four direct implications for analysts and federal program managers. First, the effectiveness of federal and state program requirements, role orientations and management tools must be studied over the long-term. Cross-sectional analyses or similar snap-shots of the earlier stages of implementation may be suitable for providing broad-brush pictures of program variations, but they cannot offer sensitive understandings of how the various factors that influence implementation interact, or how federal strategies can affect those factors, particularly role orientation. The real issue is not whether implementation in the school districts of State A is different from implementation in the school districts in State B, but rather how federal actions can move both states closer to implementing programs in all of their districts in accordance with federal expectations. We are particularly intrigued with the fact that the role orientations of federal program groups in SEAs can change, and that federal strategies can over time lead to changes in role orientation as well as in both the dimensions and the specific administrative procedures of state program management.

Second, the importance of role orientation in this framework of the intergovernmental implementation of federal programs in education, also illustrates

the limitations of using simple measures of administrative activity in explaining local implementation or, from a federal perspective, promoting more effective implementation. The tendency of analysts and federal bureaucrats to rely on indicators of administrative behavior such as the numbers of monitoring visits, technical assistance workshops or newsletters to assess the quality of administration is misplaced. We observed states that look alike on such indicators, but because very different messages are given--messages that reflect each state's role orientation--the quality of implementation varies accordingly. For example, more directive states have less need to threaten the use of sanctions embodied in either federal regulations or in state law to enforce compliance than less directive states, who have not demonstated their willingness to exercise authority if and when it is needed.

Third, state-to-state variations in role orientation suggest the wisdom of some degree of differential administration of federal requirements according to the needs and characteristics of states. While the notion of differential administration has been around for a long time (see for example Berke and Kirst, 1972 and Sundquist and Davis, 1969), it apparently has not become either a credible or a popular idea with the Congress. Federal program administrators practice a measure of differential administration across states, but the differences that emerge are relatively marginal. Renewed attention needs to be given to formal and realistic strategies for treating states differently according to differences in role orientation and in the dimensions of administrative performance, in a manner that does not do fundamental damage to program objectives. Federal administrative and statutory strategies designed to promote uniform standards for management activity without regard to fundamental differences in role orientation, are likely to result in unacceptable variations in local implementation.*

*We have recommended a number of ways in which compliance and program improvement in Title I can be promoted in states with very different role orientations, through a combination of incentives and administrative flexiblity (Goettel et. al., 1977).

Fourth, the framework that we offer recognizes the importance of a basic statutory design for each program. Changes in a statute and in regulations can clarify federal expectations and can reduce the possibility for intergovernmental conflicts that arise over ambiguities in expectations. At the same time, by placing great importance on role orientation and dimensions of state (and local) program administration, we are in fact arguing that statutory remedies cannot address implementation problems that derive from the sometimes subtle differences in state performance. A program's legal framework is a necessary but insufficient guarantee of successful implementation. By expressing this view we clearly differ from other observers who recently have placed predominant importance on the role of statutory remedies in correcting implementation problems (see, for example, Sabatier and Mazmanian, 1980).

How generalizable is this conceptual framework for understanding the implementation of federal programs? We believe that our framework is directly applicable to federal grant programs in education in which states and state education agencies have important administrative responsibilities. Federal administrators of grant programs need to understand the potential sources of implementation problems, and this framework can serve such a need. We believe the framework is also applicable to federal incentive grant programs designed to alter the way states cary out state and federal responsibilities and interact with their LEAs. For example, the NIE's State Capacity Building Program in Dissemination is going to be largely influenced by differences among states in role orientation and in the dimensions of implementation. Strategies for building capacity that are successful in some states, may well be inappropriate or even inadequate for others.

We are somwhat reluctant to suggest that this or any single implementation framework can be generalized to all intergovernmental settings. General implementation frameworks that cannot capture the important and unique dynamics that distinguish education from other program areas in the "picket-fence" of federal-/state/local relations, may be of little utility to the analyst or manager in non-education areas. There are, however, a number of program areas where the federal--or state--government is (1) concerned with program management and improvement as well as with regulatory compliance, and (2) where an intermediate governmental unit such as a state or county agency plays a key role in interpreting and supervising implementation in subordinate units that actually deliver services. In health, welfare, human services and economic development to name only a few such areas, intermediate governments must often balance federal expectations with the particular needs, values and capacities of local, street-level units. As long as one believes that these intermediate levels of government can affect subordinate local service delivery, in both intended and unintended ways, then a framework like the one presented here can contribute to understanding the factors that influence local implementation.

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"A New Model for Federal Change Agent Programs", Sol H. Pelavin*

22.14/Table 4 (Individually Scheduled Papers Division G, and Division A), Thursday Morning, 8:45-9:30, Civic Center (Room 200, 3rd Floor).

"An Empirical Comparison of Four Indicators of Test Speededness", Nick Maruhnich*

Session: 23.12/Effects from Bias, Test-Wiseness, Speededness and Guessing (Critique, Division D), Thursday Morning, 10:35-12:05, Sheraton (Clarendon, 3rd Floor)

"Assessing and Improving the Accuracy of Title I Evaluation with Grade-Appropriate Tests", Edward Moran, West Virginia Department of Education; Robert F. Baker* and Nick Maruhnich*

Session: 23.13/Methods of Program Evaluation (Paper Presentation, Division D), Thursday Morning, 10:35-12:05, Sheraton (Dalton Room, 3rd Floor)

"Policy Implications Analysis", Michael Everett, Indiana University; A. Jackson Stenner*

Session: 23.20/Evaluation Potpourri (Critique, Division H), Thursday Morning, 10:45-12:05, Sheraton (Gardner, 3rd Floor)

"An Application of Psychometric Procedures in the Non-Psychological Domain: Development of Dissemination System Scales Using Classical Test Theory and Rasch Scaling Techniques", Robert F. Baker*, Jolinda K. Decad*, Doren L. Madey*, and A. Jackson Stenner*

Session: 24.19/Applications of Latent Trait Theory, Sequential Analysis and Multi Dimensional Scaling, (Paper Presentation, Division D), Thursday Afternoon, 12:35-1:55, Sheraton (Beacon F, 3rd Floor)

"Tuition Assistance and Income Neutrality in College Choice", William Shaut, State University of New York, Central Administration; Robert J. Goettel*

Session: 24.31/The Impact of Student Financial Aid on Postsecondary Education (Critique, SIG/Postsecondary Education), Thursday Afternoon, 12:25-1:55, Civic Center (Revere, 3rd Floor).

"Evaluating Title I Early Childhood Programs: Problems, the Applicability of Model C, and Several Evaluation Plans", Keith McNeil* and Emily A. Findlay*

Session: 26.05/Multiple Regression Analysis - Application and Interpretation (Symposium, SIG/Multiple Linear Regression), Thursday Afternoon, 4:05-6:05, Sheraton (Constitution, 2nd Floor)

Discussant: Judy McNeil*

*NTS Employees

"Development of Comprehensive State Dissemination Plans: An Overview of Present Status", Joseph F. Haenn*

"Developing Empirical Descriptions of Educational Linkage Agents", Doren L. Madey* and Robert F. Baker*

Session: 3.11/ Perspectives on Knowledge Utilization at the System, Organizational and Individual Levels (Critique, SIG/Research Utilization), Monday Afternoon, 4:05-5:35, Sheraton (Exeter, 3rd Floor).

"State Grants for Capacity Building in Dissemination", Eugene C. Royster*

Session: 5.18/Relating Research to Policy on Dissemination Symposium, Division A), Tuesday Morning, 8:15-10:15, Sheraton (Beacon G, 3rd Floor).

"Effects of Magnet School Enrollment Changes on Desegregation", John C. Larson, Montgomery County Schools; Eugene C. Royster*

Session: 6.10/Perspectives on the Effectiveness of Desegregation (Paper Presentation, Division G), Tuesday Morning, 8:45-10:15, Civic Center (Room 202, 3rd Floor).

"The Distributions of NCE, Percentile and Grade Equivalent Scores Among Twelve Nationally Standardized Achievement Tests", Thomas B. Williams*

Session: 6.12/Achievement Testing: Methodological Issues (Critique, Division H), Tuesday Morning, 8:45-10:15, Civic Center (Revere, 3rd Floor).

"History and Development of the Fund for the Improvement of Postsecondary Education", Jan Shefter*, Diane Pelavin*, and Martin Orland*

"An Analysis of the Fund's Comprehensive Grant Program", Becky Jon Hayward*, Dan Johnston* and Diane Pelavin*

"An Analysis of the Achievements and Impacts of the Fund's Projects", Diane Pelavin*, Dan Johnston* and Jan Shefter*

"An Analysis of the Fund's Managemet Strategy", Martin Orland*, Becky Jon Hayward* and Jan Shefter*

"Hypotheses About the Successes of the Fund for the Improvement of Postsecondary Education", Sol H. Pelavin*, Martin Orland* and Becky Jon Hayward*

Session: 17.22/A Study of the Fund for the Improvement of Postsecondary Education (Symposium, SIG/Postsecondary Education), Wednesday Afternoon, 2:15-3:45, Sheraton (Beacon F, 3rd Floor).

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"Reasons Why Testing and Evaluations Don't Inform", Joseph F. Haenn*

Session: 28.19/SEA and LEA Strategies to Use Testing and Evaluation Information for Local School Improvement (Symposium, Division H), Friday Morning, 8:15-10:15, Sheraton (Constitution, 2nd Floor)

Critic: Robert J. Goettel*

"The Regression Route to Reliability Coefficients", Bob Burton, L. Miranda & Associates; A. Jackson Stenner*

Session: 30.13/Test Reliability (Critique, Division D), Friday Morning, 10:35-12:05, Sheraton (Clarendon, 3rd Floor)

"What is Educational Significance?", Michael B. Bunch*

Session: 30.20/Evaluation Research: Impact on Policy (Critique, Division H), Friday Morning, 10:35-12:05, Sheraton (Gardner, 3rd Floor)

"Toward a Conceptual Framework for Understanding State and Local Implementation of Federal Aid Programs in Education", Martin E. Orland* and Robert J. Goettel*

Session: 30.22/Implementing Organizational Change (Paper Presentation, Division A), Friday Morning, 10:35-12:05, Sheraton (Beacon G, 3rd Floor)

"Test Item Development: An Empirical Study of Practical Problems", Nick Maruhnich* and Thomas Dunning*

Session: 32.09/Issues in Test Construction and Interpretation (Paper Presentation, Division D), Friday Afternoon, 2:15-3:45, Sheraton (Clarendon, 3rd Floor)

"Identification of Oral Communication Skills in Children and an Analysis of Developmental Differences in Performance", Jolinda K. Decad*

Session: 32.18/Oral Reading and Oral Communication in Children (Critique, Division C), Friday Afternoon, 2:15-3:45, Civic Center (Hancock, 3rd Floor)

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  National Institute of Education.
- Evaluation of Urban Area Experience-Based Career Education Program.
  Office of Career Education, US Office of Education.
- Follow-Up Study of Patients Who Had I-131 and Other Diagnostic Procedures During Childhood.
  DHEW/FDA Bureau of Radiological Health.
- National Evaluation of Headstart Educational Services.
  Administration for Children, Youth and Families.
- Operation of the ESEA Title I Technical Assistance Center, HEW Region III.
  Office of Evaluation and Dissemination, US Office of Education.
- Delaware Item Pool Development.
  Delaware State Department of Public Instruction.
- Evaluation of the Comprehensive Project in Adult Functional Literacy Education.
  North Carolina State Board of Community Colleges.
- ESEA Title I Evaluation: District of Columbia.
  District of Columbia Public Schools.
- Educational Policy Development Center for Educational Quality and Improvement.
  Office of the Assistant Secretary for Education/Policy Development.